

Freedom Court Reporting, Inc

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF TEXAS
3 MARSHALL DIVISION

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5 _____

6 PATTY BEALL, MATTHEW
7 MAXWELL, TALINA McELHANY and
8 KELLY HAMPTON, Individually
9 and on behalf of all other
10 similarly situated,
11 Plaintiffs,

12 v. 2:08-cv-422 TJW
13 TYLER TECHNOLOGIES, INC., and
14 EDP ENTERPRISES, INC.,
15 Defendants.

16 _____
17 _____

18 DEPOSITION OF
19 JOY FLYNN

20
21 At Raleigh, North Carolina
22 Tuesday, July 27, 2010; 9:17 a.m.
23 Reported by: Lindsey D. Cline, CVR

367 Valley Avenue Birmingham, Alabama (877) 373-3660

EXHIBIT NO. 38

Freedom Court Reporting, Inc

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1 A P P E A R A N C E S

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1 T A B L E O F C O N T E N T S

2 E X A M I N A T I O N S

3 EXAMINATION PAGE

4 Direct Examination by Mr. McKeeby 6

5 Cross Examination by Ms. Bagley --

6

7 T A B L E O F C O N T E N T S

8 E X H I B I T S

9 EXHIBITS DESCRIPTION MARKED/REFERENCED

10 Number 1 Letter 17/18

11 Number 2 Consent to Opt In 89/

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1 Q. Was there a way, from looking at the calendar, for
2 you to know that you were performing the initial
3 part of that training process, or did you just
4 kind of know that?

5 A. Okay. I understand what you're saying now. When
6 you're doing -- when you're first setting up like
7 for HR or payroll, first employee records have to
8 be built out there. And that's where you go in
9 and put in the employee benefits, put in their
10 beneficiary type information. All of that type of
11 information has to be set up. Employee
12 deductions, for example. Are they purchasing
13 savings bonds or anything that's coming out of
14 their pay? So that is what I'm referencing as the
15 initial steps, the initial setup. So sometimes
16 that would be the work that needed to be done
17 before you can even run a payroll. You have to
18 have the employee information in the system along
19 with their employee records. So when you run the
20 payroll processes, it can link back to that
21 employee to know what deductions need to be taken
22 out for state tax, federal tax, any type of
23 deductions, wage garnishments, anything like that.

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1 So first you have to build those employee
2 records. So when you're looking at this Excel
3 spreadsheet, even though it may say payroll under
4 there, it would say, "Employee record setup" --

5 Q. Okay.

6 A. -- or something of that nature.

7 Q. Okay. So the actual calendar would indicate not
8 only payroll but the type of payroll training that
9 you would be performing?

10 A. The type of processes, yes.

11 Q. Got it. And what you just described, the building
12 the employee records, setting up the
13 beneficiaries, the deductions from payroll, that's
14 the type of -- that's what you mean when you say,
15 "Getting the group started on the process" --

16 A. That is --

17 Q. -- the initial steps?

18 A. That is correct, yes.

19 Q. And so that's the type of training you performed?

20 A. That is correct.

21 Q. Okay. So I take it that you would be -- for the
22 training you would be doing, you wouldn't
23 necessarily be training end users with respect to

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1 functionality; but you would be training people
2 who would be setting up the system at the
3 customer?

4 A. That is correct.

5 Q. Did these people have some particular designation
6 or title?

7 A. The people that I generally worked with were
8 people that actually worked in payroll processes,
9 actually worked in HR. So they were familiar with
10 their old processing system. And now we're
11 plugging this information into the new system, so
12 -- and verifying that everything from their old
13 system has moved over correctly to the new
14 software system.

15 Q. Okay. I take it the calendar would tell you how
16 long you were supposed to be at a particular
17 location?

18 A. Yes.

19 Q. Did you ever have any role in -- and again, we're
20 now talking about the three to four months --

21 A. Yes.

22 Q. -- while you were on your own. Did you ever have
23 any role in setting up the calendar or the agenda?

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1 A. No.

2 Q. That was done by Jodi?

3 A. Yes.

4 Q. When you were doing the initial training, had the
5 customer already been converted -- as we defined
6 that term earlier -- to the Tyler system?

7 A. Sometimes.

8 Q. Was there anything it depended on or was it just
9 -- did it vary?

10 A. There was various reasons. Sometimes when they
11 did the initial conversion, there may have been
12 problems with the conversion processes so the
13 programmers had to figure out what -- kind of
14 troubleshoot the software to see what the
15 situation was. But normally it was mostly all
16 converted.

17 Q. Okay. Okay. When you went to Iowa -- I think you
18 said you took two trips to Iowa?

19 A. I believe so, two.

20 Q. Was that for the same customer?

21 A. Yes, yes, it was.

22 Q. Why did you only have to make two trips to Iowa
23 versus the many weeks that you went back to

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1 Newport News? Was that a function of the number
2 of people that had to be trained or something
3 else?

4 A. The number of people. I believe in Iowa it was
5 only about 200 employees. And I was just doing
6 the initial piece, setting up employee benefit
7 information.

8 Q. And what about in Newport News? Was it more
9 employees that had to be trained then?

10 A. Yeah. They had whole departments of persons. And
11 their employee database was as much as between
12 7,000 and 10,000 employees. So the various
13 different departments that go along with that.

14 Q. Was there any type of recordkeeping that you were
15 required to do that summarized your work?

16 MS. BAGLEY: Object to the form.

17 Q. (Mr. McKeeby) Did you have -- does the term trip
18 reports mean anything to you?

19 A. Yeah. Those trip reports again -- and I think
20 that's what these little half sheets of paper
21 might -- I'm sorry. The trip reports, yes. The
22 trip reports was like a summary once the week was
23 complete that you wrote up what you did every day

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1 with the client, what was accomplished, any
2 questions that the client may have had, any
3 unresolved issues that may need to be addressed by
4 a person more senior than myself, which was Jodi.

5 Q. But you were the person that drafted the trip
6 report?

7 A. Yes, I was.

8 Q. And was that done, you said, on a weekly basis?

9 A. Yes, it was.

10 Q. But it summarized daily activities?

11 A. Yes, it did.

12 Q. What did you do with the trip reports, just give
13 them to Jodi?

14 A. They were e-mailed to Jodi, yes. Jodi, and I
15 think a copy also went to Penny.

16 Q. You copied Penny on the e-mail?

17 A. I believe so, yes.

18 Q. In terms of the training that you conducted as an
19 implementation specialist, was it classroom style
20 training typically?

21 A. Yes.

22 Q. So there would be multiple people in the class?

23 A. Yes, there would be.

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1 Q. And they would all have laptop computers?

2 A. No.

3 Q. You would have a projection of a laptop?

4 A. A projection of the laptop. Some of them did have
5 their own laptop. And some people just worked off
6 the screen. But generally, most times there was a
7 laptop available in the training room.

8 Q. For each person who was attending the training?

9 A. Yes. Most times there was.

10 Q. And how did you know how to conduct the training
11 at a particular location in terms of what to show
12 the people in the classroom?

13 A. That was based on the experience I had from
14 shadowing the more senior persons. And then
15 before going to a particular location, Jodi would
16 -- we would have a conversation and discuss what
17 the needs of the clients were and what I would be
18 training the client on.

19 Q. Was that documented, the kinds of training that
20 the client would need, or was that just something
21 conveyed to you in communications orally with
22 Jodi?

23 A. Orally with Jodi. And it would also be shown on

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